

# EXHIBIT A



81 MAIN STREET WHITE PLAINS, NY 10601-1711  
TEL: (914) 559-3100 FAX: (914) 949-1160  
WWW.HPMB.COM

Bianca M. Van Deusen  
Associate  
bvandeusen@hpmb.com

March 4, 2022

Jae Lee, Esq.  
JSL Law Offices, P.C.  
626 RXR Plaza  
Uniondale, New York 11556

Re: Minhye Park v. David Dennis Kim, M.D.  
Index No.: 1:20-cv-02636-PKC-LB  
Our File No.: 778-1018

Dear Ms. Lee:

As you are aware, our firm represents Dr. David Dennis Kim in this action.

Attached please find our Response to your January 28 Discovery Demand and the Expert Report of Dr. Dias Martin, which was served on February 2, 2022 via electronic mail.

Thank you for your attention to this matter.

Very truly yours,

Bianca M. Van Deusen

The signature of Bianca M. Van Deusen is written in blue ink. It is a cursive signature that appears to read "B. M. Van Deusen". Below the signature, the name "Bianca M. Van Deusen" is printed in a blue, sans-serif font.

Enclosures

2531083.1

**HEIDELL, PITTONI, MURPHY & BACH, LLP**

NEW YORK | CONNECTICUT | WESTCHESTER | LONG ISLAND

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK                     )  
  ) ss.:  
COUNTY OF WESTCHESTER         )

**ROSA KULKA**, being sworn, says:

I am not a party to the action, am over 18 years of age and am employed by HEIDELL, PITTONI, MURPHY & BACH, LLP.

On March 4, 2022, a true copy of the annexed **CORRESPONDENCE TO PLAINTIFF** via First Class Mail upon the following party at the address designated by said party for that purpose by delivering a true copy of same and enclosed in a post-paid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York

**TO:** Jae Lee, Esq.  
JSL Law Offices, P.C.  
626 RXR Plaza  
Uniondale, New York 11556

  
\_\_\_\_\_  
**ROSA KULKA**

Sworn to before me this  
4<sup>th</sup> day of March, 2022

  
\_\_\_\_\_  
NOTARY PUBLIC

**ELIZABETH PERSAMPIERI**  
Notary Public - State of New York  
No. 01TO6361855  
Qualified in Westchester County  
My Commission Expires July 17, 2025